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U.S. DISTRICT COURT

7 *Representing the United States of America*

8 UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 ERICK RANGEL-IBARRA,

13 Defendant.

COMPLAINT

Case No. 2:20-mj-843-NJK

**VIOLATION:**

18 U.S.C. § 1073(1) – *Unlawful Flight to  
Avoid Prosecution*

14 BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned  
15 Complainant, being duly sworn, deposes and states:

16 COUNT ONE

17 *Unlawful Flight to Avoid Prosecution*  
(18 U.S.C. § 1073(1))

18 On or about August 29, 2020, in the State and Federal district of Nevada,

19 ERICK RANGEL-IBARRA,

20 defendant herein, did move or travel in interstate and foreign commerce with intent to avoid  
21 prosecution, or custody or confinement after conviction, under the laws of the State of  
22 Nevada, for a crime, which is a felony under the laws of the State of Nevada, to wit: Open  
23 Murder, all in violation of Title 18, United States Code, Section 1073(1).  
24

**PROBABLE CAUSE AFFIDAVIT**

1. Your Complainant is a Special Agent with the Federal Bureau of Investigation (FBI) currently assigned to the Las Vegas Field Office and has been so employed for two years. Prior to this, he was a police officer for 10 years with the North Las Vegas Police Department and Western Illinois University Police Department. As an FBI Agent, your Complainant is assigned to the FBI's Las Vegas Violent Crimes Task Force and is responsible for investigating a variety of violent crimes, to include bank robbery, kidnapping, extortion, robbery, carjackings, assaults and murders of federal officers, racketeering related violent offenses, as well as long-term investigations into the activities and operations of career criminals, criminal enterprises, drug trafficking organizations, and violent street gangs. Your Complainant has experience in conducting criminal investigations, including the investigation of criminal groups and conspiracies as well as the collection of evidence and the identification and use of witnesses.


2. Your Complainant respectfully submits that this affidavit establishes probable cause in support of the issuance of a Criminal Complaint and Arrest warrant for Erick Rangel-Ibarra (hereinafter referred to as "Rangel") for Unlawful Flight to Avoid Prosecution in violation of 18 U.S.C. § 1073(1). The information contained herein is based on your Complainant's personal knowledge of the investigation, information provided to him by other law enforcement officers and his review of documents and reports prepared by other law enforcement agencies in connection with the investigation of this case. This affidavit is submitted solely to establish probable cause in support of this Criminal Complaint and Arrest Warrant; it does not contain all information known to your Complainant regarding this matter. All times noted are approximate.

1                                    **FACTS ESTABLISHING PROBABLE CAUSE**

2            3.        On August 30, 2020, investigators with the Las Vegas Metropolitan Police  
3 Department (LVMPD) and FBI received a report that the victim, (herein referred to as  
4 "L.P.") was missing. L.P. was last known to be with Rangel on a date the night of August  
5 29, 2020. L.P. did not return home and family did not hear from L.P. since she was last  
6 with Rangel. Investigation into L.P.'s disappearance led investigators to find L.P.'s dead  
7 body northeast of Las Vegas, which they believed Rangel placed there. The investigation  
8 also showed that after L.P.'s body was placed in its discovered location, Rangel left Las  
9 Vegas with the help of his father, Jose Rangel (hereinafter referred to as Jose), and fled to  
10 Mexico.

11           4.        On September 11, 2020, an arrest warrant was issued in Las Vegas Justice  
12 Court charging Rangel with Open Murder and Destroy/Conceal Evidence, in violation of  
13 Nevada Revised Statutes (NRS). The arrest warrant was authorized by Justice of the  
14 Peace Elana Lee Graham, Las Vegas Township Justice Court. *See* Court Case No. 20-  
15 CR-023088-001.

16           5.        The LVMPD has requested the FBI's assistance in locating and arresting  
17 Rangel pursuant to the arrest warrant issued in their jurisdiction. In addition, LVMPD has  
18 confirmed that they will seek to extradite Rangel if he is located and arrested outside of  
19 their jurisdiction. The last location where Rangel was believed to be was near Ciudad  
20 Jimenez, Chihuahua, Mexico, where Jose's phone was showing to be located. Rangel's  
21 family received a phone call from an unknown Mexico number and with a male voice on  
22 the line they believed was Rangel. Rangel said he was okay and then quickly ended the  
23 call.



10 Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1  
by telephone on September 24, 2000.

11   
12 UNITED STATES MAGISTRATE JUDGE